

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**CRIMINAL NO. 3:16cr50 DPJ-FKB**

**CARL REDDIX**

**MOTION TO AMEND THE AGREED PRELIMINARY ORDER  
OF FORFEITURE PURSUANT TO RULE 32.2(e)**

The United States of America, by and through its United States Attorney, respectfully moves, pursuant to the provisions of 21 U.S.C. § 853(p) and Rule 32.2(e) of the Federal Rules of Criminal Procedure, to amend the Preliminary Order of Forfeiture (ECF No. 64) in this action to include certain property of the defendant, Carl Reddix, as substitute property to satisfy the \$1,266,438.00 Money Judgment of forfeiture entered against defendant Carl Reddix.

1. On May 3, 2017, the defendant, Carl Reddix, entered a plea of guilty to Count 7 of the Indictment, which charged him with bribery in violation of 18 U.S.C. § 666(a)(2).

2. As a result of Carl Reddix's guilty plea to Count 7 of the Indictment, for which the United States sought forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, this Court ordered the defendant, Carl Reddix, to pay a \$1,266,438.00 Money Judgment. *See* Preliminary Order of Forfeiture, ECF No. 64.

3. The Government's right to forfeited property arises under 18 U. S. C. § 982(a)(1). The forfeiture of property under 982(a)(1) is governed by the procedures set forth in 21 U. S. C. § 853. See 18 U. S. C. § 982(b)(1). Sub-section (p) of 18 U. S. C. § 853 allows the Government to substitute other property of the defendant if the property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

4. The Government maintains it is entitled to relief under 18 U. S. C. § 853(p) because the Government has conducted, and continues to conduct an extensive investigation of Carl Reddix's current and past assets in order to satisfy the money judgment entered against him, and to date, the United States has not been able to locate funds available to adequately satisfy this judgment.

5. The Government has substantial evidence that the following personal and real property assets are owned and/or controlled by defendant Carl Reddix:

- a. All funds on deposit with BankPlus, 385 A Highland Colony Parkway, Suite 110, Ridgeland, MS 39157, Account No. 4820430447;
- b. All funds on deposit with Regions Bank, 210 E Capitol Street, Jackson, MS 39201, Account No. 5002923761;
- c. All funds held with Morgan Stanley, 4450 Old Canton Road, Suite 100, Jackson, MS 39211, Account No. 220-115054-058-1-0;
- d. All funds held with Morgan Stanley, 4450 Old Canton Road, Suite 100, Jackson, MS 39211, Account No. 220-109182-058-1-0;
- e. All funds held with Morgan Stanley, 4450 Old Canton Road, Suite 100, Jackson, MS 39211, Account No. 220-115054-058-1-0;
- f. All funds held by AXA Equitable Life Insurance Company and/or AXA Advisors, LLC, 1290 Avenue of Americas, 13<sup>th</sup> Floor, New York, NY 10028, Contract No. 096507523;
- g. All funds held by MetLife Insurance Company USA, 4700 Westown Parkway, Suite 200, West Des Moines, IA 50266-2266, Contract No. 8948839;

- h. All funds held by Mississippi Government Employees' Deferred Compensation Plan and Trust, P.O. Box 173764, Denver, CO 80217-3764, Plan 98949-01 Xerox State Healthcare, LLC, Participant ID 8262280;
  - i. All funds held by Brighthouse Financial, Brighthouse Life Insurance Company, 4700 Westown Parkway, Suite 200, West Des Moines, IA 50266-2266, Contract No. 8948839;
  - j. Promissory Note in the amount of \$172,000, payable by Michael A. Reddix to Carl M. Reddix, dated May 4, 2016, and secured by Land Deed of Trust for Lot 19, Woodlea Subdivision, Part 5, Hinds Conty, Mississippi in Plat Box 26, Page 36, in the office of the Chancery Clerk of Hinds County;
  - k. Loan in the amount of \$70,000, payable by Reddix Medical Group, 6501 Dogwood View Parkway, Jackson, MS 39213, to Carl Reddix;
  - l. 2013 Lexus E35, VIN: JTHBK1GGXD2013892;
  - m. 2009 Lexus ES, VIN: JTHBJ46G792277293;
  - n. 2013 BMW 328, VIN: WBA3A5C58DF453085;
  - o. 204 Summit N Drive, Atlanta, Georgia;
  - p. 500 acres of land in Jackson County, Mississippi;
  - q. 6090 Woodlea Road, Jackson, Mississippi;
  - r. 735 Fairview Street, Jackson, Mississippi; and
  - s. 25% interest in Reddix Medical Group, TIN 64-0825603.
6. The United States requests that the Court enter an order finding the personal and real property described above, to be a substitute asset and forfeited to the United States for disposition according to law.
7. The United States further requests that the United States Marshals Service be

empowered to seize the real property described above and/or otherwise ensure its availability for forfeiture so that its availability may be preserved for forfeiture pending the conclusion of any third-party proceedings which may be conducted in this matter pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure and 21 U. S. C. § 853(n).

8. Following the Court's disposition of all third-party interests, the Court shall, if appropriate, enter a Final Order of Forfeiture as to the property which is the subject of this order of forfeiture, vesting clear title in the United States of America.

9. Pursuant to the provisions of 21 U. S. C. § 853(p), the United States has the authority to forfeit additional substitute assets to satisfy the remaining balance of the forfeiture judgment.

WHEREFORE, pursuant to the provisions of 21 U. S. C. § 853(n) and Fed. R. Crim. P. 32.2, the United States requests that this Court enter a Final Order of Forfeiture substituting the real property described above as a substitute asset.

Dated this the 15th day of December, 2017.

Respectfully submitted,

D. MICHAEL HURST, JR.  
United States Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of December 2017, I electronically filed the foregoing document with the Clerk of Court using the CM/0ECF system, which sent notification of such filing to all counsel of record.

This the 15th day of December, 2017.

*Darren J. LaMarca*

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